



U.S. Department of Justice

Antitrust Division

*Liberty Square Building  
450 5<sup>th</sup> Street, N.W.  
Washington, DC 20530*

January 28, 2025

**VIA ECF**

Honorable Leda Dunn Wettre, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *United States of America, et al. v. Apple Inc., No. 2:24-cv-04055 (JXN-LDW)***  
**Joint Letter Requesting Entry of the [Proposed] Discovery Confidentiality Order and the [Proposed] Stipulated Protective Order Governing Review, Production, and Handling of Source Code in This Action**

Dear Judge Wettre:

Plaintiffs and Defendant respectfully submit this joint letter seeking entry of (1) the [Proposed] Discovery Confidentiality Order (attached hereto as Exhibit A) and (2) the [Proposed] Stipulated Protective Order Governing Review, Production, and Handling of Source Code in this Action (“Source Code Protocol” attached hereto as Exhibit B).

Following the Court’s guidance at the hearing on October 10, 2024, the Parties and Non-Party Intervenors worked together to address and resolve the outstanding issues on both proposed orders. For the Discovery Confidentiality Order, the Parties and Non-Party Intervenors have agreed to language governing tiers of disclosure, and the Parties have agreed to language concerning data security. Per the Court’s suggestion, the Parties adopt a definition of “Party” for purposes of the Source Code Protocol only. In addition, the Parties have revised the Source Code Protocol to make express that it applies to the Parties only.

Respectfully submitted,

/s/ Jonathan H. Lasken

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA et al.,

*Plaintiff,*

v.

APPLE INC.

*Defendants.*

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Case No. 2:24-cv-04055-JXN-LDW

**CERTIFICATE OF SERVICE**

I hereby certify that the above letter and this Certificate of Service were served upon defendant's counsel, Liza M. Walsh, Esq., Craig S. Primis, Esq., Devora W. Allon, Esq., and K. Winn Allen, Esq., 1301 Pennsylvania Avenue, NW, Washington, D.C., 20004, by CM/ECF on January 28, 2025.

BY: s/ Jonathan H. Lasken  
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